

Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017.

1. Date filed: March 1, 2018
2. Name of company(s) covered by this certification: Low Latency Communications LLC
3. Form 499 Filer ID: 831188
4. Name of signatory: Matthew D. Hardeman
5. Title of signatory: Vice-President
6. Certification:

I, Matthew D. Hardeman, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings initiated or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: _____

By: Matthew D. Hardeman
Title: Vice-President

Attachment: Accompanying statement explaining CPNI procedures

Attachment:

Statement on Low Latency Communications' CPNI Compliance Procedures

Company uses CPNI for the limited purposes of initiating, delivering, billing for, and collecting for telecommunications services. Company does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. Company does not permit the use of CPNI information for marketing purposes.

Company has established procedures to verify an incoming caller's identity. Company trains its personnel in both the use of CPNI, and protection of its confidentiality. Company also limits the number of employees that have access to customer information and call data. Employees with access to CPNI data are trained on the handling of this data and the need for confidentiality. Access to CPNI data is logged and records of this access are maintained.

CPNI handling is reviewed with new employees before access to CPNI is granted.

Company monitors systems for data breach and in the event of a data breach would make appropriate reports to law enforcement as required by the Commission.

Company will track consumer complaints pertaining to CPNI and maintain records of these for reporting.